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PRISONER'S CIVIL RIGHTS COMPLAINT (Rev. 12/2023)

IN THE UNITED STATES DISTRICT COURT  
FOR THE Bowie County DISTRICT OF TEXAS  
Eastern DIVISION

Willis E. Walker 14646  
Plaintiff's Name and ID Number

Bowie County Correction  
Place of Confinement

CASE NO. 5:25-CV-00036 RWS-JBB  
(Clerk will assign the number)

v.  
Bowie County Correction Center 105 West Front St.  
Texarkana, Texas 75501  
Defendant's Name and Address

N/A  
Defendant's Name and Address

N/A  
Defendant's Name and Address  
(DO NOT USE "ET AL.")

INSTRUCTIONS - READ CAREFULLY

NOTICE:

Your complaint is subject to dismissal unless it conforms to these instructions and this form.

1. To start an action you must file an original and one copy of your complaint with the court. You should keep a copy of the complaint for your own records.
2. Your complaint must be legibly handwritten, in ink, or typewritten. You, the plaintiff, must sign and declare under penalty of perjury that the facts are correct. If you need additional space, **DO NOT USE THE REVERSE SIDE OR BACK SIDE OF ANY PAGE.** ATTACH AN ADDITIONAL BLANK PAGE AND WRITE ON IT.
3. You must file a separate complaint for each claim you have unless the various claims are all related to the same incident or issue or are all against the same defendant, Rule 18, Federal Rules of Civil Procedure. Make a short and plain statement of your claim, Rule 8, Federal Rules of Civil Procedure.
4. When these forms are completed, mail the original and one copy to the clerk of the United States district court for the appropriate district of Texas in the division where one or more named defendants are located, or where the incident giving rise to your claim for relief occurred. If you are confined in the Texas Department of Criminal Justice, Correctional Institutions Division (TDCJ-CID), the list labeled as "VENUE LIST" is posted in your unit law library. It is a list of the Texas prison units indicating the appropriate district court, the division and an address list of the divisional clerks.

**FILING FEE AND IN FORMA PAUPERIS (IFP)**

1. In order for your complaint to be filed, it must be accompanied by the statutory filing fee of \$350.00 plus an administrative fee of \$55.00 for a total fee of **\$405.00**.
2. If you do not have the necessary funds to pay the fee in full at this time, you may request permission to proceed *in forma pauperis*. In this event you must complete the application to proceed *in forma pauperis*, setting forth information to establish your inability to prepay the fees and costs or give security therefor. You must also include a current six-month history of your inmate trust account. If you are an inmate in TDCJ-CID, you can acquire the application to proceed *in forma pauperis* and the certificate of inmate trust account, also known as *in forma pauperis* data sheet, from the law library at your prison unit.
3. The Prison Litigation Reform Act of 1995 (PLRA) provides "... if a prisoner brings a civil action or files an appeal *in forma pauperis*, the prisoner shall be required to pay the full amount of a filing fee." See 28 U.S.C. § 1915. Thus, the court is required to assess and, when funds exist, collect, the entire filing fee or an initial partial filing fee and monthly installments until the entire amount of the filing fee has been paid by the prisoner. If you submit the application to proceed *in forma pauperis*, the court will apply 28 U.S.C. § 1915 and, if appropriate, assess and collect the entire filing fee or an initial partial filing fee, then monthly installments from your inmate trust account, until the entire \$350.00 statutory filing fee has been paid. (The \$55.00 administrative fee does not apply to cases proceeding *in forma pauperis*.)
4. If you intend to seek *in forma pauperis* status, do not send your complaint without an application to proceed *in forma pauperis* and the certificate of inmate trust account. Complete all essential paperwork before submitting it to the court.

**CHANGE OF ADDRESS**

It is your responsibility to inform the court of any change of address and its effective date. Such notice should be marked "**NOTICE TO THE COURT OF CHANGE OF ADDRESS**" and shall not include any motion for any other relief. Failure to file a NOTICE TO THE COURT OF CHANGE OF ADDRESS may result in the dismissal of your complaint pursuant to Rule 41(b), Federal Rules of Civil Procedure.

**I. PREVIOUS LAWSUITS:**

- A. Have you filed *any* other lawsuit in state or federal court relating to your imprisonment? ☒ YES ☐ NO
- B. If your answer to "A" is "yes," describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, giving the same information.)
  1. Approximate date of filing lawsuit: 2023
  2. Parties to previous lawsuit:
 

Plaintiff(s) Willis E. Walker

Defendant(s) Judge Tidwell
  3. Court: (If federal, name the district; if state, name the county.) 202 District Court Bowie C
  4. Cause number: Ter
  5. Name of judge to whom case was assigned: \_\_\_\_\_
  6. Disposition: (Was the case dismissed, appealed, still pending?) Dismissed Lack of Cha
  7. Approximate date of disposition: Unknown add

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II. PLACE OF PRESENT CONFINEMENT: Bowie County Correctional Center / Texarkana Texas

III. EXHAUSTION OF GRIEVANCE PROCEDURES:

Have you exhausted all steps of the institutional grievance procedure? YES ☒ NO

Attach a copy of your final step of the grievance procedure with the response supplied by the institution.

IV. PARTIES TO THIS SUIT:

A. Name and address of plaintiff: Will's E. Walker Highway 73 West Washington Arkansas 71862

B. Full name of each defendant, his official position, his place of employment, and his full mailing address.

Defendant #1: Terry B

Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you.

Defendant #2: LT. Bennett Bowie County Correctional Center  
UNKNOWN

Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you.

Camera operator filming to separate Mr. Walker from another  
inmate

Defendant #3: LT. Holmes Bowie County Correctional Center  
UNKNOWN

Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you.

Standing beside LT. Bennett when separating Mr. Walker from inmate

Defendant #4: 3 other CO's names positions and addresses UNKNOWN  
The ones who grabbed Mr. Walker from behind and slung him onto his back

Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you. force to floor

Defendant #5: \_\_\_\_\_

Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you.

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V. STATEMENT OF CLAIM:

State here in a short and plain statement the facts of your case, that is, what happened, where did it happen, when did it happen, and who was involved. Describe how each defendant is involved. You need not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach extra pages if necessary, but remember the complaint must be stated briefly and concisely. IF YOU VIOLATE THIS RULE, THE COURT MAY STRIKE YOUR COMPLAINT.

Mr Willis Walker placed into the holding cell 5 other inmates the one by the name Ronald Walker jumped Willis while he was laying on the floor facedown asleep. Willis was awakened by the inmate while he was asleep. Willis struggled to try to break loose from inmate, LT Bennet and LT Holmes seen it from the camera feed. They rushed to the door with three other CO's names unknown. By this time Willis struggled to be on top of Ronald Walker then they immediately grab Willis and slung him back down onto the floor with force when they did so collapsed the neurotic nerve on the left side. Willis had to have immediate surgery at St. Michael. He was transported from Wadely to St Michael. Wadely had no neuro surgeons. Willis is now coming to a walker.

VI. RELIEF:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

Want to be compensated for pain and suffering. I know longer am able to walk to needed destinations. I need second surgery on my right side. After surgery I will need a wheel chair. My outcome will be unknown.

VII. GENERAL BACKGROUND INFORMATION:

A. State, in complete form, all names you have ever used or been known by including any and all aliases.

Willis Walker, Uncle Willis, Baby Boy, Joe Walker

B. List all TDCJ-CID identification numbers you have ever been assigned and all other state or federal prison or FBI numbers ever assigned to you.

ADC 130836 Bowie County 136940, Bowie County 14646 (Current)  
State Bar NO. 913092

VIII. SANCTIONS:

A. Have you been sanctioned by any court as a result of any lawsuit you have filed? ☐ YES ☒ NO

B. If your answer is "yes," give the following information for every lawsuit in which sanctions were imposed. (If more than one, use another piece of paper and answer the same questions.)

1. Court that imposed sanctions (if federal, give the district and division): \_\_\_\_\_

2. Case number: \_\_\_\_\_

3. Approximate date sanctions were imposed: \_\_\_\_\_

4. Have the sanctions been lifted or otherwise satisfied? ☐ YES ☐ NO

C. Has any court ever warned or notified you that sanctions could be imposed? \_\_\_\_\_ YES \_\_\_\_\_ NO

D. If your answer is "yes," give the following information for every lawsuit in which a warning was issued. (If more than one, use another piece of paper and answer the same questions.)

1. Court that issued warning (if federal, give the district and division): \_\_\_\_\_
2. Case number: \_\_\_\_\_
3. Approximate date warning was issued: \_\_\_\_\_

Executed on: \_\_\_\_\_  
DATE

\_\_\_\_\_  
(Signature of Plaintiff)

### PLAINTIFF'S DECLARATIONS

1. I declare under penalty of perjury all facts presented in this complaint and attachments thereto are true and correct.
2. I understand, if I am released or transferred, it is my responsibility to keep the court informed of my current mailing address and failure to do so may result in the dismissal of this lawsuit.
3. I understand I must exhaust all available administrative remedies prior to filing this lawsuit.
4. I understand I am prohibited from bringing an *in forma pauperis* lawsuit if I have brought three or more civil actions or appeals (from a judgment in a civil action) in a court of the United States while incarcerated or detained in any facility, which lawsuits were dismissed on the ground they were frivolous, malicious, or failed to state a claim upon which relief may be granted, unless I am under imminent danger of serious physical injury.
5. I understand even if I am allowed to proceed without prepayment of costs, I am responsible for the entire filing fee and costs assessed by the court, which shall be deducted in accordance with the law from my inmate trust account by my custodian until the filing fee is paid.

Signed this 23 day of 1, 20 25.  
(Day) (month) (year)

\_\_\_\_\_  
Willis E. Walker  
(Signature of Plaintiff)

**WARNING: Plaintiff is advised any false or deliberately misleading information provided in response to the above questions may result in the imposition of sanctions. The sanctions the court may impose include, but are not limited to, monetary sanctions and the dismissal of this action with prejudice.**



## A Small Summary

Mr. Walker about being confined to this walker needs to have another surgery on his right side in the near future. The outcome is unknown but Mr. Walker could be permanently paralyzed; whenever, the second operation takes place. Mr. Walker is already experiencing loss of feeling in his right arm & leg. The day of this accident was on and about on the date of 05/02/2024, the day of arrest & transferred to the Bi-State District Center for booking. The following day on 05/03/2024, he was transferred to the annex (Bowie County Correctional Center) that is the day the accident took place where Mr. Ronald Walker attacked Mr. Willis Walker while asleep (Mr. Ronald Walker is no relation to Mr. Willis Walker). Mr. Willis Walker on 05/05/2024 was released from Bowie County Correctional. On 05/06/2024, Mr. Willis Walker went to St. Michael Medical Hospital. St. Michael's troubleshoot Mr. Walker and asked him questions about the accident then proceed to give him some pain pills & muscle relaxers then sent him home. With all due respect Mr. Walker felt he should've received an MRI & an X-ray. He feels that they denied him proper medical procedures & lacked medical integrity. Little did Mr. Walker know that St. Michael represents Bowie County & their medical staff on all medical outcomes from there infirmary located in their county jail. The healthcare provider from St. Michael's asked Mr. Walker what Bowie County medical do for him and he informed her that they (Mr. Edward Harclinger) gave him 2 shots. He could not stand on his own strength so they placed him in a wheelchair then proceeded to place him in a pod & had him sleeping on the floor. When he was released on a Sunday which was on the 5<sup>th</sup> the following day on the 6<sup>th</sup> (which was on a Monday) St. Michael did a diagnostic on Mr. Willis Walker and instead of him getting better, Mr. Walker started to get worse in his health. On the 19<sup>th</sup> of June 2024, Mr. Willis Walker couldn't get himself up out of bed on his own to use the restroom. On the 20<sup>th</sup>, Mr. Walker went to Wadley Hospital where Wadley ran X-rays & MRIs on Mr. Walker. The doctor then told Mr. Walker that he couldn't release him but would have to transport him to another hospital for immediate surgery. Wadley wanted to send Mr. Walker either to Dallas, TX or Little Rock, AR caused Mr. Walker had informed Wadley that he

had already been seen at St. Michael Medical Hospital. Mr. Walker informed Wadley that he couldn't afford to be sent out of town which the healthcare provider at Wadley said, "Well the only place they could send Mr. Walker to was back to the care of St. Michael Medical." Because they had nearby surgeons which they sent him back to on the 20<sup>th</sup> of June 2024. Mr. Walker had surgery on that Monday, 06/24/24 on his lower left nerve in the back. That is when they confined him to a walker. 5 months later (on 11/03/2024) Mr. Walker was found not guilty by the grand jury then upon his release on 01/31/2025, Mr. Walker will be providing the address to where he will be living at (Highway 73 West, Washington, Arkansas 71862). The documentary of what took place is in the sheriff department records & files. There's audio, video, and witnesses. LT. Bennett was the 1<sup>st</sup> witness - with the video camera, the 2<sup>nd</sup> witness was LT. Holmes (who's a female) she was standing behind LT. Bennett while he filmed 3 other correctional officers grabbing Mr. Willis Walker slinging him backwards which led to him landing on his back. They slung him with great force and he slid at least 3 feet backwards. Mr. Walker was in severe pain and they picked him up and placed him in a wheelchair then rolled him to the infirmary.